

REMARKS

The enclosed is responsive to the Examiner's Office Action mailed on March 16, 2010. By way of the present response, Applicant has: 1) amended claims 126, 132, and 137; 2) added new claim 168; and 3) canceled no claims. Support for the amendment is found in the specification as originally filed – e.g., at least in the least paragraph of page 29 and first paragraph of page 30. No new matter has been added. Applicant respectfully requests reconsideration of the present application.

Examiner Interview

Applicant thanks Examiner Basehoar for the courtesy of conducting a telephone interview with Applicant and the undersigned attorney on May 18, 2010 to discuss proposed amendments to the claims and the significance of the art cited in relation to the claims. The parties discussed the differences between the art cited and the claims. The Examiner recommended clarifying the claim language directed to the configuration of the one more selected actions. No agreement as to patentability of the claims was made.

Claim Rejections - 35 U.S.C. § 103

Claims 126-129, 131-140, 142, 144-147, and 150-154 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Strong et al., U.S. Patent 6,167,523 ("Strong") in view of Lindhorst et al., U.S. Patent No. 6,268,852 ("Lindhorst") in further view of Hitchcock et al., U.S. Patent No. 7,376,891 ("Hitchcock").

Applicant respectfully submits that Strong does not teach or suggest a combination with Lindhorst and that Lindhorst does not teach or suggest a combination with Strong in the manner alleged by the Examiner. Applicant submits that the combination is the result of impermissible hindsight based solely upon the present application and improperly distilling claim elements to a gist or thrust. The Examiner argues that it would be obvious to combine Lindhorst with Strong because Lindhorst allegedly would allow Strong to "customize the processing actions to be specified for data entered into any given form." Applicant respectfully disagrees.

Strong describes a registry wizard to assist in registry configuration. Strong describes receiving data from a specific submission of a form and determining whether or not a registry key identifier is included in that inputted data. When Strong refers to receiving a “form,” it refers to receiving data from a specific submission of a form. The registry key identifier identifies the location in the server registry at which processing and validation information specific to the form is located. The forms data validation and processing control program is a CGI executable that uses the registry keys as arguments to apply in validating the form data.

Lindhorst, on the other hand, describes generating and editing event handlers within an HTML document. Using the program described by Lindhorst, a user can edit and generate scripts that are then incorporated into the HTML document. These scripts react to user interactions (e.g., mouse clicks) within the HTML document. Lindhorst does not teach or suggest a program that generates or edits an external program such as Strong’s CGI executable. Strong and Lindhorst both recognize the difficulty and expertise required to develop, respectively, CGI programs and HTML-based scripts. Strong’s registry is not an HTML document – it is simply a registry of key value pairs in a computer. Therefore, Lindhorst cannot be used to generate scripts within Strong’s registry. Even if Lindhorst was used to generate an external script, Lindhorst does not describe generating scripts that could process or otherwise handle data from a specific submission of a form.

Citing the Lindhorst as GUI-based software to generate program code to carry out actions without recognizing the type of code, the type of actions, where they are located, their compatibility with Strong, etc. improperly distills the claim language to a gist or thrust. Applicant recognizes that some elements of Strong and Lindhorst may be combined. The references cannot be combined, however, as alleged by the Examiner. For example, if a hypothetical user wanted to work with an HTML form, Lindhorst’s program could be used to modify the form by generating or editing scripts within that form – e.g., the user could choose what color a link in the HTML form turns after it is “clicked.” Additionally, a specific submission of data from that HTML form might be directed to Strong’s CGI executable. Strong’s CGI executable may utilize registry keys and/or call separate handlers for the validation and processing of

that data. Lindhorst does not teach or suggest, however, that the user could use Lindhorst's program to generate or modify Strong's CGI executable or separate handlers that validate data entries from a specific submission of the HTML form. Even if Lindhorst were modified in order to create an external handler, Lindhorst does not describe any actions that may be dependent upon the data input during the specific submission of a form.

Accordingly, Applicant respectfully submits that the Examiner has failed to provide a rational underpinning for the alleged combination of Strong and Lindhorst.

Even if the references were combined, Applicant respectfully submits that Strong, Lindhorst, and Hitchcock fail to disclose

receiving, through a network, a form authored by a form authoring tool and containing one or more input fields;

parsing, independently of the form authoring tool, the received form to identify the input fields contained in the received form;

providing, independently of the form authoring tool, a graphical user interface to enable selection and configuration of one or more actions to be carried out in response to a subsequent specific submission of the form to a server by a third party, wherein the graphical user interface includes the identified input fields, ***wherein the selection of the one or more actions is from a group of two or more types of actions, wherein the configuration of the one or more actions allows for the customization of the behavior of the selected one or more actions and allows for the behavior of the configured actions to be dependent upon the identified input fields or the data input during the specific submission of the form to the server;***

automatically generating, independently of the form authoring tool, program code to carry out the one or more ***selected and configured actions***, wherein the program code is ***external to the form*** and independent of the form authoring tool.

(Claim 126) (emphasis added).

Strong describes using a registry wizard to modify a registry – not generating the claimed external program code. Strong only describes manipulating arguments in the registry, which may be referenced by a CGI executable. Furthermore, the

manipulation of these arguments only affects one function: validation. Strong's description of the examination of user-submitted form data is primarily limited to checking for registry key identifiers within submitted data and performing validation of the data values against the registry field entries.

The Examiner argues that Strong's validation and processing are equivalent to the claimed two or more actions. Applicant respectfully disagrees. Strong does not describe in any detail what "processing" is performed. Strong often refers to "validation and processing" as a single concept that appears to refer only to the function of validation. Strong vaguely refers to further processing being performed by separate handlers. Strong does not describe selecting validation and/or the further processing. Instead, Strong states that further processing occurs upon completion of validation: "If no invalid input data is identified, one or more data processing programs, also referred to herein as 'handlers,' are invoked by the data validation and processing control program to process the input data." (Strong, col. 1, lines 44-47). Furthermore, those separate handlers appear to be manually coded and static. Strong does not describe what the handlers do or provide any means for generating, accessing, or customizing individual handlers.

Applicant notes that, in rejecting some of the dependent claims, the Examiner alleges that Strong describes further processing such as, e.g., computing one or more quantities from data in a specific submission of a form, generating a license in response to a specific submission of a form, and generating a cookie for each user that submits a specific submission of a form. Applicant has reviewed Strong in its entirety, including the sections cited by the Examiner, and respectfully submits that Strong is silent regarding any of these exemplary actions.

Furthermore, Strong is silent regarding the customization of selected actions via a graphical user interface. Therefore, Strong fails to disclose a graphical user interface to enable selection of one or more actions from a group of two or more actions to be carried out in response to a subsequent specific submission of the form and configuration of the one or more actions, which allows for the customization of the behavior of the selected one or more actions.

Lindhorst describes GUI-based software for creating and editing event handler scripts for HTML documents for HTML objects. Lindhorst makes the distinction between external program code (e.g., a CGI script) and scripts within an HTML document (e.g., Java or VB script) and specifically describes generating a script ***within*** the HTML document – not the claimed external program code. (Lindhorst, col. 1, lines 41-58, col. 21, lines 46-48).

Even if Lindhorst were to generate a script that was not embedded in the original HTML document, Lindhorst fails to disclose actions to be ***dependent upon the data input during the specific submission of the form to the server***. Lindhorst's actions are client-side actions - e.g, when an HTML object is "clicked" by a user, it is displayed in a different color. Lindhorst's GUI does not contemplate actions to be carried out in the server in response to a subsequent specific submission of a form to the server.

Furthermore, Lindhorst is silent regarding the customization of selected actions via a graphical user interface. Therefore, Lindhorst also fails to disclose a graphical user interface to enable selection of one or more actions from a group of two or more actions to be carried out in response to a subsequent specific submission of the form and configuration of the one or more actions, which allows for the customization of the behavior of the selected one or more actions.

Hitchcock describes a form engine that permits the creation and processing of customizable forms and sharing of information/input data between forms. Hitchcock contemplates a prewritten (not automatically generated) CGI script (Col. 4, lines 36-44). Hitchcock is silent regarding a graphical user interface to enable selection of one or more actions from a group of two or more actions to be carried out in response to a subsequent specific submission of the form and configuration of the one or more actions, which allows for the customization of the behavior of the selected one or more actions.

Accordingly, Applicant respectfully submits that Strong, Lindhorst, and Hitchcock, alone or in combination, fail to disclose all of the features of claim 126.

While claims 132 and 137 differ from claim 126, they contain similar features to those discussed above. Accordingly, Applicant respectfully submits that the

rejection of claims 132-137 has been overcome for at least the reasons set forth above.

Given that claims 127-129, 131, 133-136, 138-140, 142, 144-147, and 150-154 are dependent upon claims 126, 132, and 137, and include additional features, Applicant respectfully submits that the rejection of claims 127-129, 131, 133-136, 138-140, 142, 144-147, and 150-154 has been overcome for at least the reasons set forth above.

Claims 148-149 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Strong, in view of Lindhorst, in view of Hitchcock, in further view of Whitmyer, U.S. Patent No. 5,895,468 (hereinafter "Whitmyer").

Whitmyer describes a device for automatically querying a docket, generating a response form based upon a retrieved client reminder, and emailing the response form to a client computer. The client may then choose a desired option and, the client computer generates a reply email based on the client's response.

Given that claims 148-149 are dependent upon claim 126, and include additional features, and given that Whitmyer does not remedy the shortcomings of Strong, Lindhorst, and Hitchcock described above, Applicant respectfully submits that the rejection of claims 148-149 has been overcome for at least the reasons set forth above.

New Claim

While new claim 168 differs from claim 126, it contains similar features to those discussed above. Accordingly, Applicant respectfully submits that claim 168 is patentable over Strong, Lindhorst, Hitchcock, and Whitmyer for at least the reasons set forth above.

CONCLUSION

Applicant respectfully submits that all rejections have been overcome and requests reconsideration of the present application.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Ryan W. Elliott at (408) 720-8300.

Respectfully submitted,

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